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Mr Charles Auer
Director of Office of Prevention, Pesticides and Toxic Substances
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Dear Mr. Auer:

I am in receipt of two letters from your office concerning overdue commitments on the HPV program. I am concerned that the U.S. EPA does not appear to have an effective program to follow-up on submissions and for that reason I have elected to respond directly to your office. Throughout the program, Honeywell has taken a responsible position and has met all of its commitments to the HPV program. I feel that excellent working relationships have been developed between your staff and industry. This has lead to an unprecedented sharing of toxicology information between the EPA, Industry and the Public.

Therefore, when I received your April 12, 2004 letters regarding "Overdue Commitments" this raised my concern. My responses to the first letter are detailed below. The three compounds listed in the attachment to the second letter (CAS # 75-68-3; 354-33-6; and 1717-00-6) were all repeats of the chemicals listed in the first letter. In summary, all of our HPV chemicals have been addressed and in most cases, the dossiers have been reviewed by OECD and it has been determined that they are a low priority for further work. Two were a part of the API chemical family program. In the remaining two cases where we are involved in a testing program, we are waiting for comments from EPA. Once those comments are received, we will initiate the testing program.

I appreciate the complexity of administering a program as broad as the HPV program and trust that this information will be of help.

Sincerely

Gec M. Rusch, Ph.D., DABT, FATS
Director of Toxicology and Risk Assessment

Cc: Mr Alan Roy

First Letter

CAS Number	9 th Collective Index Name	Start Year	Status
75-68-3	Ethane, 1-chloro-1,1-difluoro	2000	Completed: Classified as Low priority for further work (by AtoFina for our consortium)
107-29-9	Acetaldehyde oxime	2002	Submitted 2002 We are waiting for EPA approval of our test plan*
354-33-6	Pentafluoroethane	2001	Submitted 2004 Low priority for further work (by Solvay for our consortium).
1646-75-9	Propanal, 2-methyl-2-(methylthio)-oxime	2002	Submitted in 2002 We are waiting for EPA approval of our test plan*
1717-00-6	Ethane, 1,1-dichloro-2-fluoro	2000	Completed: Classified as Low priority for further work (by Honeywell for consortium)
64741-57-7	Gas oils	2003	Included in the API program
70913-85-8	Residues, petroleum	2003	Included in the API program

* Honeywell had submitted a SIDS dossier and test plan on each material in 2002, received comments from EPA with a request to make a major modification in the test plan. After discussion with our co-sponser, DSM, we submitted a revised test plan in March of this year. If acceptable to EPA we will begin testing immediately.